



**Linda S. Adams**  
Secretary for  
Environmental Protection

# Air Resources Board

**Mary D. Nichols, Chairman**  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)



**Arnold Schwarzenegger**  
Governor

April 7, 2008

Mr. Leon Schuster  
Franklin Fueling Systems  
Dispensing Systems Product Manager  
3760 Marsh Road  
Madison, Wisconsin 53718

Dear Mr. Schuster:

On February 4, 2008, the California Air Resources Board (ARB) received an amendment request from Franklin Fueling Systems (FFS) requesting a vendor change for the nozzle casting used to produce the Model 900 nozzle that is certified on the Healy Phase II Enhanced Vapor Recovery (EVR) Executive Orders (EO) VR-201 series and VR-202 series. The nozzle casting (made of aluminum) is the first component of the nozzle body which has various sections machined to tight tolerances to facilitate the installation of all the other subassemblies and components that are part of the design and manufacturing of the Model 900 nozzle.

The vendor change, as outlined by FFS, has the following elements:

- A. New vendor for casting;
- B. New mold for casting;
- C. Non-tumbled finish of the new casting; and
- D. Etching vs. Embossing of the "900" on the side of the casting.

In support of this request, FFS submitted samples of the current and new casting (including sectioned pieces that allow for internal inspection), test results of nozzle efficiency testing conducted by VOC Testing, Inc., and engineering evaluation data from FFS engineering staff. Most importantly, the cover letter of your request stated the following:

"Since there are no dimensional or functional changes to the casting, no EO changes have been identified as part of this amendment. Since there are no changes in material or machining to the new casting, no fluid or system compatibility issues have been identified as part of this amendment."

Based on the information provided by FFS, ARB staff has determined that this request does not require certification testing, since there are no physical changes to the

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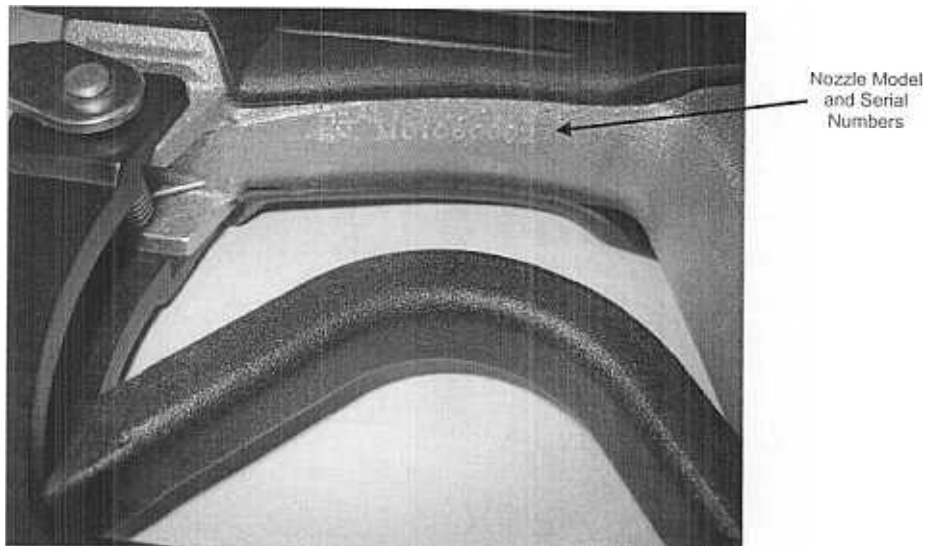
California Environmental Protection Agency

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components. No modifications to the EO VR-201 and VR-202 series are needed since the model number is not changed. FFS will inform ARB in writing stating the serial numbers when the new casting is manufactured and is offered for sale in California.

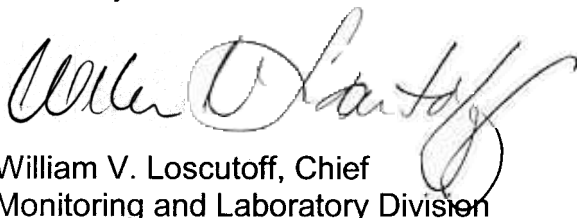
District inspectors and Healy Certified Technicians will be able to determine nozzles manufactured with the new casting by the physical appearance between the currently tumbled casting and the non-tumbled casting. The location of the nozzle model number and serial number will remain the same. The figure below shows the nozzle model and serial number location on the new non-tumbled casting.

**New Casting for Healy Model 900 Nozzle with Model and Serial Numbers**



Should you have any questions or concerns regarding this letter, please contact either Paul Marzilli at (916) 445-7431 or via email at [pmarzill@arb.ca.gov](mailto:pmarzill@arb.ca.gov), or Pat Bennett at (916) 322-8959 or via email at [pbennett@arb.ca.gov](mailto:pbennett@arb.ca.gov).

Sincerely,

  
William V. Loscutoff, Chief  
Monitoring and Laboratory Division

cc: See next page

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cc: Jim Swaney  
San Joaquin Valley Air Pollution Control District

John Marvin  
Bay Area Air Quality Management District

Gary Ma  
Yolo-Solano Air Quality Management District

Isam Boulad  
Sacramento Metropolitan Air Quality Management District

Randy Smith  
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Department of Industrial Relations

Kevin Graves  
State Water Resources Control Board